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July 11, 2019

Via ECF and Email

Hon. Paul A. Engelmayer
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Randall, et al.*,
Docket No. 19 Cr. 131 (PAE)

Dear Judge Engelmayer:

I represent Geraldine Faustin in the above referenced matter. I am writing to request a modification of Ms. Faustin's bail conditions to allow her to travel on Saturday, July 13, 2019 from her home on Long Island to Philadelphia, PA so that she may attend the viewing, funeral and burial of her recently deceased uncle.

Geraldine Faustin was arrested in this case on February 27, 2019 and released on conditions principally requiring a bond in the amount of \$50,000 cosigned by two financially responsible individuals, with home confinement with electronic monitoring to permit her to work, Pretrial Services supervision and with travel restricted to the SDNY and EDNY. All conditions have been satisfied and Ms. Faustin appears to be doing well. Ms. Faustin resides with her mother. She is working full time as a home health aide. Recently the Court modified Ms. Faustin's bail conditions to substitute a curfew as directed by Pretrial Services for home confinement.

I have been in contact with Pretrial Services Officers Amanda Sanchez (EDNY) and John Moscato (SDNY)¹ who advise that Pretrial Services consents to the requested bail modification to allow Ms. Faustin to travel from Long Island to Philadelphia so that she may

¹ Because Ms. Faustin resides on Long Island, she reports to Pretrial Services in the EDNY

Hon. Paul A. Engelmayer

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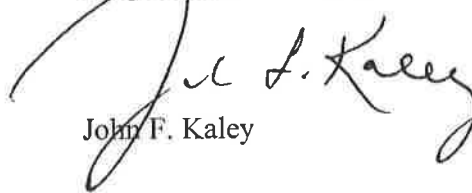
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attend the viewing, funeral and burial of her uncle. I have been in contact with AUSA Daniel Wolf who advises that the Government defers to Pretrial Services and does not object to the requested bail modification. Pretrial Services is amenable to extending Ms. Faustin's curfew to permit her to travel to Philadelphia for the reasons noted, but because Ms. Faustin would be traveling outside her bail travel limits, a Court Order is required

Accordingly, for the reasons set forth herein, I respectfully request that Ms. Faustin's bail conditions be modified to permit Ms. Faustin to travel to and from Philadelphia on Saturday, July 13, 2019.

Thank you for your consideration of this request.

Respectfully submitted,



John F. Kaley


cc: AUSA Daniel Wolf
Pretrial Services Officers Amanda Sanchez and John Moscato
(all via ECF filing and email)

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GRANTED. Mr. Faustin shall provide location information as to the funeral home and cemetery to the Pretrial Services Department. The Court sends its condolences to Ms. Faustin and her family. The Clerk of Court is requested to terminate the motion at Dkt. No. 128.

7/11/2019

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge